HEALTH, SAFETY AND ENVIRONMENTAL DISCLOSURE SCHEDULE
ALLIEDSIGNAL FLUORGLAS
HOOSICK FALLS, NY

BACKGROUND

AlliedSignal Fluorglas is a manufacturer of Pressure Sensitive Adhesive Tape (PSAT), Teflon coated fiberglass cloth and yarn and Teflon tape. The business consists of six sites located in Hoosick Falls, NY, (McCaffrey Street, Liberty Street, John Street, River Road 1, River Road 2 and River Road 3.) A description of each site, the products manufactured and a summary of relevant health, safety and environmental issues are noted below.

McCaffrey Street

The McCaffrey Street facility produces a wide variety of PTFE (Teflon) coated fiberglass and molded and extruded PTFE intermediates. The facility is also used for administrative offices and R&D. Approximately 95 employees work at the site. Manufacturing operations occur 24 hours per day 7 days per week.

Process Description

In the manufacturing process woven fiberglass is coated with a dispersion of premixed liquid Teflon and an organic liquid surfactant. The mixture is fed from a drum into a coating dip pan. The coated fabric is then cured in an oven and collected on a web. Each coating tower has its own curing oven either gas-fired or infra-red. The coated material is then sized and calendared in a large laminate calendaring machine where heat and pressure are applied.

The Teflon molding operation includes four (4) molding presses and six (6) electric sintering ovens. Teflon, virgin or reprocessed, is added, via a hopper, to the molding press where high pressure is applied and a Teflon mold is formed. The mold is then transferred to the curing oven for sintering.

The extrusion process includes one continuous heated and pressured extruder and sixteen (16) rod extruders. The process utilizes powder Teflon and produces various extruded products.

Air Quality

The fabric coating operation includes eight (8) coating towers designated T1, T2, T3, T5, T6, T7, T8 and T9. The table below summarizes the permit information for each of the coating towers. Copies of the permits are included in Attachment A. The permits include a process description, emission calculations, expiration dates and special conditions.

Tower Number	Emission Point Number	Material Emitted	Estimated Emission Amount (lbs/yr)	Permit Type	Control Equipment	Expiration Date
1	M1	Triton X	3066	Operating	None	12/12/99
2	M9	Triton X	3329	Construction	Scrubber	12/12/95
	M10	Triton X	88	Construction	None	12/12/95
3	M3	Triton X	3066	Operating	None	12/12/99
5	M4	Triton X	2891	Operating	None	12/12/99
6	M5	Triton X	3723	Operating	None	12/12/99
	M11	Triton X	657	Construction	None	12/12/95
7	M7	Triton X	3679	Operating	None	12/12/99
8	M6	Triton X	3161	Operating	Scrubber	05/01/94
9	M8	Triton X	1843	Operating	Scrubber	05/01/99

The exhaust gases from Tower 8 (Emission point M6) and Tower 9 (Emission Point M8) are treated in a common wet cyclone scrubber before being discharged to the atmosphere. The scrubber is used for opacity control. The air emission permit for Tower 8 expired on May 1, 1994. Conversations with the NY DEC have indicated that the agency will not reissue permits at this time but will reissue them as part of the Title V Operating Permit program. The current permit for Tower 9 expires 5/1/99. On June 6, 1995, an application was submitted to NY DEC requesting a modification of the permit for Tower 9 (Emission Point M8). The request was for approval to modify the stack by increasing the height to 19 feet. No response has been received from DEC.

Tower 6 has two emission points, designated M5 and M11. Emission point M5 is equipped with a wet cyclone scrubber which is used for opacity control. A state operating permit has been issued for this source. It has an expiration date of 12/12/99. There are no controls on M11. A state construction permit has been issued for this source. It has an expiration date of 12/12/95. A request for issuance of an operating permit was submitted to NY DEC on June 6, 1995. To date no response has been received from the Agency. However, the facility can operate this source under the construction permit until an operating permit is issued.

Tower 2 has two emission points, designated M9 and M10. Emission point M9 is equipped with a scrubber which has a rated efficiency of 85% for Triton X compounds. There are no controls on M10. Both emission points for this tower has been issued construction permits by DEC. The construction permits expire 12/12/95. A request for issuance of an operating permit was submitted to NY DEC on June 6, 1995. To date no response has been received from the Agency. However, the facility can operate these sources under the construction permits until operating permits are issued.

Exhaust gases from the rest of the towers emit directly to the atmosphere.

The facility also coats chrome pigmented Teflon with aluminum on Tower 7. The only emission from this process is water vapor.

The calendaring machines are discharged via roof vents to the atmosphere. No permit is required for this source since the only emission is heat.

The exhaust gases from each of the Teflon molding sintering ovens are vented to the atmosphere via its own dedicated vent. No permits are required for these sources since the only emissions are heat.

The facility has one boiler rated at 300,000 BTU/hr that burns #2 fuel oil. It is used for facility heating and, due to its size is exempt from NY DEC permitting requirements.

The facility is located in a "Marginal" Non-Attainment area classified as an Ozone transport region. The VOC and NOx threshold for "Major Source" are 50 Tons Per Year (TPY) and 100 TPY, respectively. This facility would be a "minor" source for purposes of Title V permitting.

DEC conducted an air quality inspection at the facility on May 7, 1991. No violations were noted during the inspection, however, several recommendations were made. A copy of the inspection report is included in Attachment B. Additionally, the EPA and DEC conducted a joint air inspection during the summer of 1992. No report was issued.

Water Pollution Control

Wastewater generated at the facility is discharged to the treatment plant for the Village of Hoosick Falls. The wastewater consists of scrubber water blowdown and sanitary wastewater. The discharge of the wastewater is governed by the local sewer ordinance. No permit is required for the discharge. Attachment C is a copy of a letter from the treatment plant operator indicating that the discharge from the McCaffrey Street facility is acceptable to the POTW. There are no direct water discharges from the facility.

The McCaffrey Street facility is not subject to the stormwater permitting regulations. The facility is exempt based on its SIC code, 2295 and 3089, and the fact that there is no stormwater exposed to industrial activity at the site. A letter was submitted to DEC on October 25, 1991, indicating the facility status regarding stormwater permitting. A copy of the letter is included in Attachment D.

Drinking water is supplied to the site by the Village. Tests of drinking water fountains at the facility have indicated acceptable levels of copper and lead. A copy of the test results is included in Attachment E.

Oil & Spill Prevention

Raw materials for facility operations are primarily stored in drums in the warehouse. There is no bulk storage of raw materials at the facility.

The facility has one 10,000 gallon underground storage tank. The tank is used to store #2 fuel oil for on site heating purposes and therefore, is exempt from the Underground Storage Tank regulations at 40 CFR 280. The tank installation date is unknown.

The fuel oil tank is subject to the NY Petroleum Bulk Storage Tank Regulations. These regulations require tank registration and tightness testing. The current registration certificate was issued on 9/2/93 and expires on 3/24/97. The last tightness test was conducted in November 1992. At that time the tank passed the tightness test. Retesting of the tank is not required until November 1997. A copy of the registration certificate and the tank test report are included in Attachment F. An annual standpipe analysis is also performed on the tank. A copy of the 1994 results are included in Attachment F.

The only other bulk storage tank at the facility is a 18,000 gallon aboveground LP gas tank. The LP Gas is used for process heating. This tank is not subject to any permit or registration requirements.

Solid & Hazardous Waste

The facility is a Large Quantity Generator of Hazardous Waste. It's EPA ID Number is NYD004986741. The types of hazardous waste generated at the facility include D007 wastes from the aluminum coating of Teflon and lab packs. All waste generated on site is shipped off-site for disposal.

The facility is required to submit an annual hazardous waste generators report. A copy of the 1994 report can be found in Attachment G.

Miscellaneous

There is one transformer at the facility. It is owned by the public utility, Niagara Mohawk. The utility has indicated that the transformer contains PCBs, however, they have not provided information indicating the concentration of the PCBs. The transformer is not marked.

Facility personnel have indicated that prior to 1981, hydraulic oil was used as a dust suppressant on plant roads. No analytical information is available regarding the oil.

John Street

The John Street facility produces PTFE coated yarn. The yarn is used in braided wire and cable applications. Approximately 14 people work at the site. Manufacturing operations occur 24 hours per day 5 days per week.

Process Description

In the manufacturing process fiberglass yarn is coated with a dispersion of premixed liquid Teflon and an organic liquid surfactant. The mixture is fed from a drum into a coating dip pan. The coated yarn is then cured in an oven and collected on a spool. Some of the yarn in heated in an oven prior to coating. The process is designed to drive off starch that is on the yarn

Air Quality

The table below summarizes the permit information for the air emission sources at the facility. Copies of the permits are included in Attachment H. The permits include a process description, emission calculations, expiration dates and special conditions.

Equipment Type	Emission Point Number	Material Emitted	Estimated Emission Amount (lbs/yr)	Permit Type	Control Equipment	Expiration Date
Coater	J3	Triton X	300	Operating	None	12/31/96
Coater	J6	Triton X	300	Operating	None	12/31/96
Coater	J8	Triton X	300	Operating	None	12/31/96
Oven	J9	Starch Based Sizing	799	Operating	None	12/31/96
Boiler	J10			Operating	None	12/31/96

The yarn coating operation consists of three (3) coating lines, designated J3, J6 and J8. Each line has its own oven. Two of the ovens are heated by LP Gas, the third is electric. The equipment is permitted by NY DEC. The permits expire 12/31/96. None of the equipment is equipped with pollution control equipment.

The site also has one heat cleaning oven. The oven is designated as emission source J9. The equipment is permitted by NY DEC. The permit expires 12/31/96. There is no pollution control equipment on this source.

The facility has one 3.2 MM BTU/hr boiler that burns #4 fuel oil. The source designation is J10. It has been issued an air emissions operating permit by NY DEC which expires 12/31/96.

The facility is located in a "Marginal" Non-Attainment area classified as an Ozone transport region. The VOC and NOx threshold for "Major Source" are 50 Tons Per Year (TPY) and 100 TPY, respectively. The facility is a "minor source" of air pollution, and therefore, is not subject to the permitting requirements of Title V.

The NY DEC conducted an air emission inspection at the facility on January 10, 1992. During that inspection the agency indicated that emission points J3, J6, J8 and J10 were operating in compliance with all New York State air pollution control regulations. The inspection also noted that a modification had been made to emission point J9 without first obtaining prior DEC approval. A permit modification was submitted to NY DEC in March 1992, to correct this deficiency. A copy of the inspection report can be found in Attachment I. A revised permit was issued on November 25, 1992. A copy of the permit can be found in Attachment H.

Water Pollution Control

Wastewater generated at the facility is discharged to the treatment plant for the Village of Hoosick Falls. The wastewater consists of sanitary water and process wash up water. The discharge of the wastewater is governed by the local sewer ordinance. No permit is required for the discharge. Attachment J is a copy of a letter from the treatment plant operator indicating that the discharge from the John Street facility is acceptable to the POTW. There are no direct water discharges from the facility.

The John Street facility is not subject to the stormwater permitting regulations. The facility is exempt based on its SIC code, 2295, and the fact that there is no stormwater exposed to industrial activity at the site. A letter was submitted to DEC on October 25, 1991, indicating the facility status regarding stormwater permitting. A copy of the letter is presented in Attachment K.

Drinking water is supplied to the site by the Village. Tests of drinking water fountains at the facility have indicated acceptable levels of copper and lead. A copy of the test results is included in Attachment L.

Oil & Spill Prevention

Raw materials, for facility operations, are stored in drums inside the building. There is no bulk storage of raw materials at the facility.

The facility has one 10,000 gallon underground storage tank. The tank is used to store #4 fuel oil for on site heating purposes and therefore, is exempt from the Underground Storage Tank regulations at 40 CFR 280. The tank was installed in 1970.

The fuel oil tank is subject to the NY Petroleum Bulk Storage Tank Regulations. These regulations require tank registration and tightness testing. The current registration certificate was issued on 9/2/93 and expires on 3/24/97. The last tightness test was

conducted in September 1992. At that time the tank passed the tightness test. Retesting of the tank is not required until September 1997. A copy of the registration certificate and the tank test report are presented in Attachment M. An annual standpipe analysis is also performed on the tank. A copy of the 1994 results are included in Attachment M.

The only other bulk storage tank at the facility is a 7,500 gallon aboveground LP gas tank. The LP Gas is used for process heating. This tank is not subject to any permit or registration requirements.

Miscellaneous

Prior to January 1989, wash water from cleanup of a chrome pigmented Teflon dispersion spray coating operation was discharged to the ground under the building. The equipment was subsequently dismantled and disposed of off site. It is our belief that the material discharged to the ground was not a hazardous waste. Attachment N provides the basis for this belief.

The third floor of the building was previously used for a silicone and acrylic resin coating operation. There is evidence of contamination on the floor from the adhesives used. No data is available to characterize the contamination.

Solid & Hazardous Waste

At the present time the facility does not generate any hazardous waste. However, it maintains an EPA ID Number. The number is NYD000829580.

River Road 1

The River Road 1 facility is used as a maintenance shop. Approximately 18 employees work at the site. The facility operates 8 hours per day five days per week.

Air Quality

The facility has two boilers, approximately 330,000 BTU/hr, that burn #2 fuel oil. There are no other air emission sources at the facility. No air permits are required for the boilers due to their size.

Water Quality

The only wastewater generated on site is sanitary wastewater. It is discharged to a leachfield on site. No permit is required for this discharge due to the volume of material discharged.

The facility is exempt from the stormwater permitting requirements. This is due to the fact that all roof drainage sheets off the building to the ground. A letter was submitted to

DEC on October 25, 1991, indicating the facility status regarding stormwater permitting. A copy of the letter is presented in Attachment O.

Drinking water is supplied to the site by the Village. Tests of drinking water fountains have indicated acceptable levels of copper and lead. A copy of the test results is included in Attachment P.

Oil & Spill Prevention

The facility has one 1,000 gallon underground storage tank. The tank is used to store #2 fuel oil for on site heating purposes and therefore, is exempt from the Underground Storage Tanks regulations at 40 CFR 280. The tank was installed in 1965.

Due to the size of the tank it is not subject to the NY Petroleum Bulk Storage Tank Regulations. However, a tightness test was conducted in September 1992. At that time the tank passed the tightness test. A copy of the tank test report is presented in Attachment Q. An annual standpipe analysis is also performed on the tank. A copy of the 1994 results are included in Attachment Q.

Small quantities of maintenance chemicals are stored within the building. There is no outdoor or bulk storage of materials at the site.

Solid & Hazardous Waste

The River Road 1 facility is contiguous with the River Road 2 facility. As such, the two sites share one EPA ID Number. The number is NYD991291881. The only hazardous waste generated at the River Road 1 site is waste naphtha from a parts cleaner. All wastes are disposed of off-site.

The facility is required to submit an annual hazardous waste generators report. A copy of the 1994 report, that includes information on the River Road 1 and River Road 2 facilities, can be found in Attachment R.

Miscellaneous

In 1977, Oak Materials Group, the previous owners of the site, disposed of approximately 260 cubic yards of copper hydroxide sludge on site with the approval of the Rennselaer County Health Department. The material was F006 hazardous waste. In 1984 an agreement was reached with the NY DEC to perform a site investigation. The investigation indicated that the material had not changed nor had it migrated off site. In 1987 the material was excavated and disposed of off site. On August 22, 1991, the DEC indicated that the site had been properly remediated and that no further action is required. A copy of the letter from DEC can be found in Attachment S.

River Road 2

The River Road 2 facility is used to etch Teflon coated substrate, as a custom fabrication shop for Teflon products and as a wood working shop. Approximately 6 employees work at the site. It operates 8-16 hours per day 5 days per week depending on production needs.

Process Description

The process consists of etching Teflon coated fiberglass and Teflon extrusion with sodium naphthalene and glycol ether. Water used in the etching operation is circulated through a treatment system and reused in the etching process.

Air Quality

The etching operation previously was permitted by the NY DEC. However, process modifications have eliminated the air emissions and, therefore, the air permit is not longer required. On June 30, 1994, a letter was submitted to DEC to cancel the air permit. To date no response has been received from the Agency. A copy of the letter to DEC is located in Attachment T.

The facility has two boilers. One boiler is rated at 669,000 BTU/hr and is fueled with LP Gas. It is used for process heat and is exempt from the NY DEC permitting requirements due to its size and the fuel used. The second boiler is rated at 1.2 MM BTU/hr and is fueled with #2 fuel oil. It is used to heat the facility and is also exempt from the NY DEC permitting rules due to its size and the fuel used.

Water Quality

Wastewater generated at the facility consists of water from the etching process and sanitary water.

Water from the etching process was previously discharged to a on-site leachfield under SPDES permit #NY0109991. The facility had difficulties meeting the fluoride discharge limits in the permit. Therefore, in June 1994, the process was modified so that the water is treated in a closed loop system and recirculated back to the etch tank. Spent water from the etching process is now collected in drums and shipped offsite for disposal. On July 5, 1994, a letter was submitted to DEC to relinquish the SPDES permit. A copy of the letter to DEC is located in Attachment U.

There are two leachfields on site. One is an abandoned process leachfield. The second is currently used to discharge sanitary wastewater from the facility. No permit is required for this leachfield due to the volume of material discharged to it.

The facility is exempt from the stormwater permitting requirements. This is due to the fact that all roof drainage sheets off the building to the ground. A letter was submitted to DEC on October 25, 1991, indicating the facility status regarding stormwater permitting. A copy of the letter is presented in Attachment V.

Drinking water is supplied to the site by the Village. Tests of drinking water fountains at the facility have indicated acceptable levels of copper and lead. A copy of the test results is included in Attachment W.

Oil & Spill Prevention

The facility has one 4,000 gallon underground storage tank. The tank is used to store #2 fuel oil for on site heating purposes and therefore, is exempt from the Underground Storage Tank regulations at 40 CFR 280. The tank was installed in 1975.

The fuel oil tank is subject to the NY Petroleum Bulk Storage Tank Regulations. These regulations require tank registration and tightness testing. The current registration certificate was issued on 9/2/93 and expires on 3/24/97. The last tightness test was conducted in September 1992. At that time the tank passed the tightness test. Retesting of the tank is not required until September 1997. A copy of the registration certificate and the tank test report are presented in Attachment X. An annual standpipe analysis is also performed on the tank. A copy of the 1994 results are included in Attachment X.

There are two other bulk storage tanks at the facility. The first is a 2,000 gallon above ground LP Gas tank. The gas is used for hot air makeup for the etching process. The second tank is a 10,000 gallon above ground nitrogen tank. The nitrogen is used to blanket the etchant. No permitting or registration requirements are applicable to these tanks.

Liquid raw materials, used on site, are stored in drum quantities inside the building.

Solid & Hazardous Waste

As previously mentioned, the River Road 1 and River Road 2 facilities are contiguous. Therefore, these facilities share one EPA ID Number - NYD991291881. Hazardous waste generated on site includes: cleaning liquids, flammable liquids and lab packs. All wastes are shipped off-site for disposal.

The facility is required to submit an annual hazardous waste generators report. A copy of the 1994 report, that includes information on the River Road 1 and River Road 2 facilities, can be found in Attachment R.

Liberty Street

The Liberty Street facility produces a wide variety of PTFE film products and PSAT products on three process lines including skiving, extrusion and Pressure Sensitive Adhesive Tape (PSAT) process. Approximately 80 employees work on site. Manufacturing operations occur 24 hours per day 7 days per week depending on production demands.

Process Description

In the extrusion process, the plant uses two wide web extruded tape lines that are connected to one catalytic oxidizer. The 12-inch and 16-inch wide web extruded tape lines manufacture a PTFE film product consisting of PTFE resins, aliphatic hydrocarbon solvent, inorganic coloring dyes and an organic surfactant for wetability.

The above mentioned materials are uniformly mixed together and compacted to form solid cylindrical pills. The compacted pills are extruded through a die and transformed into a continuous web. This web is then passed through an in-line calendar that manufactures the web to a required film thickness. The film is then in-line wrapped externally over internally steam heated cans that cause the aliphatic hydrocarbon solvent and components of the organic surfactant to vaporize out of the film.

In the PSAT process, the plant manufacturers silicone adhesive tape and acrylic PSAT products on three coating machines. The silicone PSA's are applied from a formulation containing xylene and toluene. The acrylic PSA's are applied from a formulation containing isopropanol, heptane, ethyl acetate and toluene. The PSA's are applied on a variety of substrates using reverse roll coater or metering bars. The product is drawn through an oven where the solvent is evaporated. The product then passes through a second portion of the oven at a higher temperature to cure the adhesive, exits the oven and is wound on a roll.

Air Quality

The table below summarizes the permit information for the air emission sources at the facility. Copies of the permits are included in Attachment Y. The permits include a process description, emission calculations, expiration dates and special conditions.

Equipment Type	Emission Point Number	Material(s) Emitted	Estimated Emission Amount (lbs/yr)	Permit Type	Control Equipment	Expiration Date
Can Line (2)	L3	-Aliphatic Hydrocarbon	-46000	Operating	Catalytic Oxidizer	11/30/97
		-Isopropanol	-5.26			
		-Methyl 2-Pyrrolidone	29.78			
60" Line		- Xylene	-2585	Operating	Thermal	11/30/97
40" Line	L9	- Toluene	-19638		Oxidizer	
Tower 4		- Isopropanol	-5995			
		- Heptane	-8465			
		- Ethyl Acetate	- 3263.5			

The extrusion process consists of two wide web extruded tape lines that are connected to one catalytic oxidizer. The emission point designation for the oxidizer is L3. The catalytic oxidizer is designed to destroy VOC laded air from the can line as well as fugitive emissions from the extruder, accumulator and calendar sections of the equipment. The oxidizer was installed in March 1993. Source testing, performed in February 1994, indicated an average destruction efficiency of 93.7%. An operating permit for the equipment was issued by NY DEC on February 9, 1995. A copy of the operating permit can be found in Attachment Y.

In May 1994, the facility began receiving odor complaints from local neighbors. Upon investigation it was determined that the odors were associated with PAE, a material used in the process as a wetting agent. Actions are being taken to reformulate the product to remove PAE from the process.

On December 15, 1994, NY DEC received calls from neighbors of the Liberty Street facility regarding the odors. On December 22, 1994, DEC visited the site to look at the Catalytic Oxidizer. On January 13, 1995, the NY DEC issued a draft Consent Order to the facility regarding the odor complaints. The Consent Order listed a number of corrective actions the facility was required to take to eliminate the odors. A final Consent Order was never issued.

During early February 1995, AlliedSignal implemented a number of corrective actions to address the odors. These actions included: 1) adding two additional feet of catalyst to the oxidizer; 2) raising the oxidizer stack an additional 20 feet to minimize the building downwash effects; and 3) adding a new burner box to reduce system leaks. NY DEC granted the facility permission to make these modifications on February 7, 1995. A copy of the letter from DEC can be found in Attachment Y. The DEC requires that a permit modification application be submitted and a new stack test be performed. Work is

continuing to identify and correct the source of the odors. A permit modification application will be submitted to the DEC when all modifications are finalized. Preparation of the stack test protocol is in process.

The facility has two process boilers on the can line. Due to their size these boilers are exempt from NY DEC air permitting regulations. They burn LP Gas.

In the PSAT process, the solvent from three coating lines, designated Tower 4, the 40" line and the 60" line, is exhausted to a recuperative fume incinerator (L9) and then to atmosphere. The incinerator uses one propane-fired burner rated at 9 MM BTU/hr. Source testing was performed on the recuperative fume incinerator in October 1992. Test results indicated an average destruction efficiency of 92.1% at an operating temperature of 1300 °F. The NY DEC issued an operating permit for this source on February 9, 1995. A copy of the permit can be found in Attachment Y.

The PSAT lines are subject to the Federal New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60 Subpart RR. The lines are also subject to NY Surface Coating Regulations at Title 6 Part 228.

An internal review of facility operations indicated that records required by both the NSPS and the NY Surface Coating Regulations were not being maintained. The facility is in the process of modifying their recordkeeping procedures to comply with the requirements.

The facility has one boiler used for facility heating. On February 18, 1995, modifications were made to this boiler to convert it from #4 fuel oil to LP Gas. Currently it burns only LPG and is rated at 3.9 MM BTU/hr. Due to the size of the boiler and the type of fuel used no permit is needed. On February 16, 1995, a letter was submitted to DEC notifying them of the boiler modifications. A copy of the letter is included in Attachment Z.

The facility is located in a "Marginal" Non-Attainment area classified as an Ozone transport region. The VOC and NOx threshold for "Major Source" are 50 Tons Per Year (TPY) and 100 TPY, respectively. The Liberty Street facility is a "Major Source" and therefore, is subject to the Federal Title V permitting regulations.

Pursuant to the New York air regulations at Part 202 the facility is required to submit an annual emissions inventory to DEC. A copy of the 1994 emissions inventory is included in Attachment AA.

Water Quality

Wastewater generated at the facility is discharged to the treatment plant for the Village of Hoosick Falls. The wastewater consists of sanitary wastewater, non-contact cooling water, wash water from pill making and boiler blowdown. The discharge of the wastewater is governed by the local sewer ordinance. No permit is required for the

discharge. Attachment BB is a copy of a letter from the treatment plant operator indicating that the discharge for the Liberty Street facility is acceptable to the POTW.

The Liberty Street facility is not subject to the stormwater permitting regulations. All roof drainage sheets off the building to the ground. There are no outside material storage or other industrial activities "exposed" to stormwater. A letter was submitted to DEC on October 25, 1991, indicating the facility status regarding stormwater permitting. A copy of the letter is presented in Attachment CC.

Drinking water is supplied to the site by the Village. Tests of drinking water fountains at the facility have indicated acceptable levels of copper and lead. A copy of the tests results is included in Attachment DD.

Oil & Spill Prevention

Raw materials for facility operations are stored in drums at the facility.

The facility has one 8,000 gallon underground storage tank. The tank was used to store #4 fuel oil for on site heating purposes and therefore, is exempt from the Underground Storage Tank regulations at 40 CFR 280. The tank was installed in 1970. The tank is subject to the NY Petroleum Bulk Storage Tank Regulations. These regulations require tank registration and tightness testing. The current registration certificate was issued on 9/2/93 and expires on 3/24/97. The last tightness test was conducted in September 1992. At that time the tank passed the tightness test. Retesting of the tank is not required until August 1997. A copy of the registration certificate and the tank test report are presented in Attachment EE. An annual standpipe analysis is also performed on the tank. A copy of the 1994 results are included in Attachment EE. On February 20, 1995, the tank was drained and temporarily closed. The tank will be removed in the Spring 1995. There is evidence of soil contamination around the fill pipe for this tank.

The facility has one 18,000 gallon above ground LP Gas tank. The LP Gas is used for oxidizer fuel and process heat. This tank is not subject to any permit or registration requirements.

Solid & Hazardous Waste

The Liberty Street facility is a Large Quantity Generator of Hazardous Waste. The EPA ID Number for the facility is NYD000829598. Hazardous waste generated on site includes: petroleum naphtha from a parts washer, waste resin and solvent and waste kerosene from the Can Line. All hazardous waste generated on site is shipped off-site for disposal.

The facility is required to submit an annual hazardous waste generators report. A copy of the 1994 report can be found in Attachment FF.

Construction debris, i.e., gravel and cinder blocks, are disposed of on the back side of the property. All of this material is non-hazardous.

In the mid 1960's to mid 1970's waste adhesive and clean-up waste containing solvents was disposed of at the Hoosick landfill. The procedure typically consisted of transporting the material to the landfill where it was burned for disposal. However, some of the drums of waste were apparently buried in the landfill. No information is available regarding the exact characteristics of the waste or the volume that may have been buried.

Miscellaneous

The facility is subject to the SARA Title III reporting requirements. Reporting is required for toluene and xylene. A copy of the 1994 reports are located in Attachment GG.

River Road 3

The River Road 3 facility was previously used as a laminates manufacturing facility. Currently, it is used as an empty drum warehouse and an idle equipment warehouse.

Air Quality

The facility has one boiler rated at 1.07 M BTU/hr. It uses No. 2 fuel oil. Due to its size and the type of fuel burned it is exempt from the NY DEC air permitting rules.

Water Quality

The facility previously discharged process and sanitary wastewater to an on-site leachfield under a SPDES permit. Since there are no production processes currently operating on site there is no longer a need for the SPDES permit. The permit was, therefore, deleted by DEC on August 6, 1993. A copy of the letter from DEC is included in Attachment HH. Sanitary wastewater continues to be discharged to the leachfield.

Oil & Spill Prevention

The facility has two underground storage tanks. The first is an 8,000 gallon #2 fuel oil tank used for on site heating purposes and therefore, is exempt from the Underground Storage Tank regulations at 40 CFR 280. The tank installation date is unknown. The second tank is also used to store #2 fuel oil. It has a capacity of <1,000 gallons and, therefore, is exempt from all requirements.

The 8,000 gallon fuel oil tank is subject to the NY Petroleum Bulk Storage Tank Regulations. These regulations require tank registration and tightness testing. The current registration certificate was issued on September 2, 1993 and expires on March 24, 1997. The last tightness test was conducted in September 1992. At that time the tank

passed the tightness test. A copy of the registration certificate and the tank test report are presented in Attachment II.

The facility has two 1,850 gallon above ground LP Gas tanks. The LP Gas was used for building heat, currently they are not used. The tanks are not subject to any permit or registration requirements.

Solid & Hazardous Waste

The River Road 3 facility is contiguous with the River Road 1 and River Road 2 facilities. Therefore, all of these facilities share one EPA ID Number, NYD991291881. No hazardous waste was been generated at this facility in 1994.